

because such rights would place them squarely in the interLATA business. Thus, it is premature even to consider the public interest impacts of permitting BOCs to negotiate with location owners.

More fundamentally, however, the comments show the real abuses that can be expected if ILECs are permitted to “negotiate” the PIC selection with payphone location owners. In addition to all the actual and potential anticompetitive risks shown by AT&T (pp. 25-26),<sup>59</sup> ARVC (p. 2) vividly describes a situation in which a LEC used its power to coerce a location owner to accept the LEC’s own IXC affiliate as the PIC on the payphones on the location owner’s premises. In that case, the LEC told the location provider “that he had to use the LEC for long distance or else [it] would remove the payphones,” even though the location owner had a preexisting commission contract with AT&T. After the location owner complained and the local PUC opined that the LEC’s threat was improper, the LEC removed the payphones, reinstalled new phones with different numbers, and asserted that such phones were not governed by the prior commission agreement (which had, for call identification purposes, specifically listed the presubscribed phones by telephone number). Moreover, the LEC informed the location owner that if he wished to continue to use AT&T as the PIC, he would

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<sup>59</sup> See also WorldCom, pp. 21-22; APCC, pp. 41-43.

have to pay \$65.00 per month per phone, but if he would "choose" the LEC's affiliate as the PIC, there would be no charge for the phones.<sup>60</sup>

KOA (p. 1). another association of location owners, reveals the existence of similar problems, stating that "KOA franchisees have experienced [the] situation in several areas throughout the country where the local payphone provider refuses to provide phones on a public status unless the business operator agrees to the long distance carrier selected by that company. If the independent operator chooses another [PIC] their status is changed from public to semi-public and they are charged up to \$100 per month per phone." These incidents and others reported in the comments<sup>61</sup> graphically illustrate why BOCs and all ILECs should not be allowed to negotiate for the interLATA PIC until their market power is eliminated. Moreover, they confirm the fears of many location owners that granting ILECs this opportunity would cause location owners to "lose their interLATA decision-making authority,"<sup>62</sup> or allow the

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<sup>60</sup> See Ameritech, pp. 22-28, where Ameritech clearly implies that it expects to route the vast majority (if not all) of the 0+ interLATA traffic from its payphones to its own IXC if and when it receives in-region authority, and it even raises the possibility (p. 26) that its payphone and IXC operations could be put into the same subsidiary. See also CPA, p. 19 (describing activity of Pacific affiliates). The possibilities for abuse in such cases are obvious, for so long as the ILEC maintains its monopoly power over the placement of payphones in its region.

<sup>61</sup> See AT&T, p. 25; WPCA, p. 2 ("[s]everal LECs have threatened site owners with refusing to purchase products, such as gasoline from them should the site owner choose to obtain pay telephone services from an IPP").

<sup>62</sup> AH&MA, p. 2. See also, AAAE, p. 1; ARVC, p. 2; KOA, p. 1; Flying J, p. 1; American Airlines, p. 1; NJPA, p. 17.

LECs to "leverage their position"<sup>63</sup> to the detriment of location owners' rights -- and antithetical to the pro-competitive and pro-consumer goals of the 1996 Act. In addition, contrary to the RBOC Coalition's view (p. 45), carrier selection choices made by a location owner pursuant to a binding agreement should be honored by all PSPs regardless of when such contracts are executed. Otherwise, the location owner's ultimate right to select the presubscribed carrier cannot be preserved.<sup>64</sup>

The "competitive" reasons the ILECs advance in support of their opportunity to leverage their monopoly power with location owners do not outweigh these very real risks. AT&T's experience is that location owners infrequently demand "one stop shopping."<sup>65</sup> Instead, they typically seek to obtain the best deal they can regardless of the number of payphone-related suppliers. In all events, the only restriction ILECs face in such a situation is that they cannot be the "prime" bidder. ILECs can -- and usually do -- participate by being a subcontractor on numerous bids, and ILEC phones have been placed in a number of large locations through such arrangements.

Nor is it conceivable that allowing ILECs to negotiate with location owners would make it less likely that the location owners will choose "unsuitable

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<sup>63</sup> SDN Users, p. 2.

<sup>64</sup> The Commission should also make it clear that ILEC coercion of location owners violates Sections 201 and 202 of the Act (see AT&T, pp.26-27).

<sup>65</sup> RBOC Coalition, p. 41; Ameritech, p. 20.

carriers” and could reduce rate “gouging.”<sup>66</sup> Notwithstanding the ILECs’ claims, location owners who must serve their own customers and bear the brunt of customer dissatisfaction with any service provided on their premises, including phone service, regardless of the entity that negotiates with the owner about carrier selection. Thus, ARVC (p. 1) plainly states that “our member parks must provide the highest level of customer service possible or the paying customer will go elsewhere,” and KOA (p. 1) explains that the location owner is “the primary contact for the end user of the pay phones [on their premises] since they’re located on the property, and therefore, the performance of those phones [has] a direct reflection on the business itself.”

Accordingly, the most pro-competitive course for the Commission to follow is to deny all ILECs the opportunity to negotiate with location owners until they can demonstrate

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<sup>66</sup> Ameritech, p. 21; RBOC Coalition, p. 42.

that they no longer wield monopoly power over the placement of payphones in their geographic markets.<sup>67</sup>

### III. OTHER ISSUES

#### A. Regulatory Treatment Of LEC And AT&T Payphones.

The commenters generally agree that LECs' payphone equipment should be treated as CPE under the Commission's CI-III rules.<sup>68</sup> However, the RBOCs correctly note that the Commission's existing rules require that when such assets are removed from their rate bases, they should be valued at net book value.<sup>69</sup> Unfortunately, however, the LECs have provided virtually no data on this record to assist the Commission in determining the amount that should be deducted from their rate bases. AT&T suggests that the Commission require the production of such data

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<sup>67</sup> The PIC limitation "safeguards" proposed by APCC (p. 43) cannot be adopted by the Commission, because they are administratively unworkable and are essentially an unlawful market allocation scheme. AT&T agrees with APCC (p. 44), however, that if BOCs are permitted to negotiate with location owners while they still have market power in any relevant product market, the Commission should at least require the full structural separation of the BOC payphone subsidiary (see also ACTEL, p. 12). Indeed, the Ohio PUC (p. ii) suggests that structural separation should be required in all cases for all Tier I LECs.

<sup>68</sup> MCI, p. 15; RBOC Coalition, p. 23; GPCA (adopted by APCC, p. 41) p. 5.

<sup>69</sup> Ameritech, pp. 12-14; RBOC Coalition, pp. 27-19. See also Sprint, p. 27. Accordingly, there is no basis to create any "value" for their existing station placement agreements and reduce the LECs' local exchange operation by such amount (see CPA, p. 17; GPCA, p. ii).

promptly.<sup>70</sup> The Commission should also reject any ILEC effort to offer its payphone affiliate any service that it does not offer to other PSPs on a nondiscriminatory basis.<sup>71</sup>

There is unanimous agreement that AT&T's payphones should be deregulated. However, unlike the monopoly LECs, AT&T has no market power in any relevant market, including the payphone market. Accordingly, contrary to the RBOC Coalition's suggestion (p. 32), AT&T's payphone equipment should not be treated as ILEC CPE. Rather, it should be removed from all regulatory requirements (other than Part 68 registration requirements) and treated in the same manner as IPPs' CPE.

B. Selection Of Presubscribed Carrier For IntraLATA Calls.

The commenters generally support the Commission's conclusion (§ 75) that all PSPs should be permitted to negotiate with location owners concerning the selection of the 0+ intraLATA carrier, and that any state restrictions requiring that

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<sup>70</sup> AT&T also concurs with Ameritech (pp. 13-14) that all amounts attributable to payphone costs, both CPE and network, should be removed from the common line rate elements as an exogenous adjustment to the common line price cap index (see Ameritech, p. 14; RBOC Coalition, p. 31). The CPE costs should be assigned to the ILEC's PSP affiliate and the network costs should be recovered through the SLC. To ensure that payphone lines are not subsidized by other ratepayers, the Commission should not, as some parties suggest (USTA, p. 8; RBOC Coalition, p. 31), be transferred to the Base Factor Portion of the common line basket. Instead, the network costs should remain in the current Part 69 Pay Category. In addition, the Commission should require the states to reduce their intrastate access rates (not necessarily the intrastate CCL rate) to remove all intrastate subsidies for payphone lines (see RBOC Coalition, p. 31).

<sup>71</sup> See Section 276(a)(2) and compare RBOC Coalition, p. 25. However, an ILEC need not provide services to an unaffiliated PSP which it does not offer to its own payphone affiliate (see NTCA, p. 5).

intraLATA traffic be routed to the LEC must be eliminated.<sup>72</sup> To insure effective competition on intraLATA calls from payphones, however, the Commission must prohibit ILECs from taking actions that unreasonably limit location owners' ability to select the primary intraLATA carrier. Thus, contrary to the RBOC Coalition's apparent suggestion (p. 44), the Commission should not allow ILECs to exclude their own payphones from the intraLATA presubscription process. Moreover, in order to implement the requirements of Section 276(b)(1)(E), the Commission should require ILECs to implement intraLATA presubscription on all of their payphones (including central-office controlled phones) as soon as it is technically feasible, and no later than the time at which intraLATA equal access is implemented for other phones in the surrounding LEC serving area.<sup>73</sup>

C. Public Interest Payphones.

AT&T agrees that state regulators are in the best position to decide on most matters relating to the placement of public interest payphones, because they are most familiar with the geography, demographics and economics of their states.<sup>74</sup> If the

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<sup>72</sup> See, e.g., RBOC Coalition, pp. 43-44; APCC, pp. 45-46. Both of these commenters properly note that states should be permitted to impose reasonable requirements on all intraLATA providers regarding the handling of emergency calls.

<sup>73</sup> See AT&T, p. 28

<sup>74</sup> See, e.g., Idaho PUC, pp. 1-2; Iowa Utilities Board, , p. 4; New York DPS, p. 8; Texas PUC, p. 5.

Commission decides, however, to set national guidelines regarding public interest payphones, it should use the California program as a model, with some of the modifications suggested by APCC (pp. 50-51).<sup>75</sup> Thus, for example, to receive support as a public interest payphone, a payphone should not be on the premises of an owner receiving compensation under a contract, access to the phone should be unrestricted, and the phone should be a minimum distance from other payphones. With respect to funding, AT&T supports the suggestion of the Maine, et al. (p. 11) that funding for public interest payphones should come from the state or other entity seeking public interest payphone service. At a minimum, any Commission guidelines should require funding for public interest payphones to be applied to all PSPs on a competitively neutral basis.<sup>76</sup>

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<sup>75</sup> See also Ameritech, pp. 29-32.

<sup>76</sup> See APCC, p 51.



**CONCLUSION**

For the reasons stated above and in AT&T's comments, the Commission should adopt rules for payphone per-call compensation that are consistent with AT&T's recommendations.

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I, Ann Marie Abrahamson, do hereby certify that on this 15th day of July, 1996, a copy of the foregoing "AT&T Reply" was mailed by U.S. first class mail, postage prepaid, to the parties listed on the attached Service List.

  
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